REMARKS

Reconsideration and further examination of the subject patent application is respectfully requested in view of the present Amendment, and the following Remarks. Claims 1-20 are currently pending in the application. Claims 1, 5-8, 12-15 and 18-19 have been rejected under U.S.C. §102(e) as being anticipated by U.S. Pat. Application Publication No. 2002/0035474 to Alpdemir. Claims 2, 9 and 16 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Alpdemir in view of Gavan et al. (U.S. Pat. No. 6,601,048) and further in view of Dezonno (U.S. Pat. No. 6,233,333), and claims 3-4, 10-11, 17 and 20 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Alpdemir in view of Saylor et al. (U.S. Pat. No. 6,792,086). Claims 4 and 12 have been amended. After careful review of the claims and references, applicant believes that the claims are in allowable form and therefore a Notice of Allowance is respectfully requested.

The independent claims 1, 8, and 15 as well as dependent claims 5-7, 12-14, 18, and 19 have been rejected as anticipated by Alpdemir. Alpdemir discloses a system for voice recognition based response to telephone calls. The Office Action has indicated that Alpdemir discloses use of an artificial engine to process and answer queries. However, Alpdemir does not disclose the use of an artificial intelligence engine for forming answers to queries from callers as claimed. The citation to Alpdemir pointed out by the Office Action (Paragraph 0141) does not provide a disclosure of the claimed use of an artificial intelligence engine to answer the call center queries at all. Instead, it states in the first sentence of the paragraph, "Embodiments of the inventive system may desirably incorporate and utilize natural language speech recognition." (para, 0141, lines 2-3) There is no mention of an artificial intelligence use in this sentence or anywhere else in the paragraph. Then the last sentence adds the simple statement that artificial intelligence is known in the art and not described. This statement that AI is known is not a statement that it is used or a description of how it may be used. The sentence goes on to say that there will be no description of artificial intelligence. (See Alpdemir para [0141], line 8-9"... and artificial intelligence are known in the art and not described in greater detail

here"). The Office Action suggests that the reference to AI in Alpdemir must be read within the context of the entire paragraph 0141. However, it is not a question of taking this statement outside the context of the earlier sentence, but of reading what is actually disclosed. Further, even within the context, the statement about AI is no more than an observation that AI is known, it does not state that it should be used, such unstated use is merely being assumed in the Office Action. Further, the context of the entire paragraph describes use of natural language speech recognition to extract requests or inquiries ("...the system interprets the user's speech to extract the request or inquiry." Para. 0141, lines 3-5) does not describe or suggest anything related to the claimed forming of answers to the queries. There is not basis for assuming a completely unstated and undisclosed context for paragraph 0141. The entire paragraph concerns only speech recognition not creation of answers. Thus, even if the description of use of speech recognition to extract requests is assumed to include AI, there is still no disclosure of use of AI to form answers to queries about the activities of the organization as claimed.

In addition, independent claims 1, 15, and 20 also call for an artificial intelligence engine with a knowledge universe comprising enterprise activities of the organization. This is also not disclosed by Alpdemir. Claims 7 and 8 limit the knowledge universe to only enterprise activities which is also not disclosed by the cited references. Claims 16 and 20 also further limit the knowledge universe to call records for forming a context for processing the call, and to agenda of the organization to provide subjective answers focused on the organization. As described, in the specification (e.g., p. 8, para 4) this limited universe provides unique advantages, and is not disclosed in Alpdemir which does not describe use of this limited universe in an AI engine or in fact, any implementation of an artificial intelligence engine to form answers to inquiries. Thus, the independent claims 1, 8, 15, and 20 distinguish over Alpdemir for at least the above reasons, and are therefore believed to be allowable. Further, the dependent claims 2-7, 9-14, and 16-19 are similarly believed to be allowable at least because they depend from allowable claims 1, 18, and 15.

Claim 9 has been rejected as obvious over Alpdemir in view of Gavan et al. ("Gavan") and Dezonno. As discussed above, Alpdemir does not teach use of an artificial intelligence engine to form answers to caller queries, and neither does Gavan. Gavan discloses a system for processing event records and uses an AI engine for pattern

recognition in the records for detecting fraud. Thus, while Gavan teaches detection of patterns in event records, it does not teach or suggest use of artificial intelligence to answer queries from callers about the enterprise activities as claimed. Thus, none of the references disclose this feature. Further, claim 2 calls for delivery of call records and the second call to the artificial intelligence engine at substantially the same time. Claim 2 has been further rejected as obvious over Alpdemir and Gavan and further in view of Dezonno. The Office Action asserts that Dezonno disclosed identifying a call record to be delivered from one ACD to another ACD and that the call record and call are delivered simultaneously at Col. 7, lines 30-44. However, Dezonno delivers the call to the agent 18C and the records to a terminal display 22C. Thus, they are delivered to two different destinations, not to a single engine or location (i.e., the artificial intelligence engine). Thus, claim 2, which is dependent upon allowable claim 1, is believed to be further distinguishable over any combination of the cited references. This feature is also not taught or suggested by Alpdemir, Gavan, or Dezonno.

In addition, claims 2, 9, and 16 call for use of call records to form a context for forming answers to the caller queries. Alpdemir does not disclose an AI engine forming a context for answering queries. Gavan, concerned with the entirely different issue of looking for fraud patterns in event records, also fails to teach or suggest this feature. This use of artificial intelligence on call records to detect fraud patterns in entirely different from using it to generate context for answers to caller questions about the enterprise activities. Dezonno discloses identifying a call record but does not disclose using the call record to form a context for an AI engine to form answers. Thus, neither Alpdemir, Gavan, nor Dezonno disclose the claimed feature of using the call records to form the context in an AI engine for forming answers to the caller queries. Accordingly, claims 2, 9, and 16 are believed to be distinguishable over the combination of Alpdemir, Gavan, or Dezonno.

Claims 3-4, 10-11, 17, and 20 have been rejected as obvious over Alpdemir in view of Saylor et al. ("Saylor"). Saylor describes using voice codes to store content which is accessible by telephone but fails to disclose use of an artificial intelligence engine to form answers to caller queries or use of the claimed specifically limited knowledge universe. Thus, none of the cited references teach these features, and the claims 3-4, 10-11, 17, and 20 are therefore distinguishable over the combination. Claim

17 has been amended to call for incorporating VXML response into documents delivered to the caller in response to the call (see p. 8, first paragraph). This feature is also not taught by the cited references.

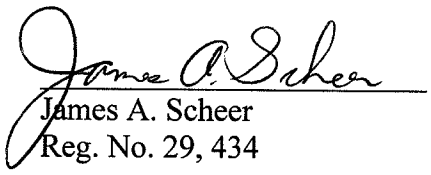
Claim 16 is believed to be allowable because it depends from allowable claim 15 and further because none of the references disclose limiting the knowledge universe for forming a context and wherein the AI engine generalizes questions.

Further claim 4 calls for an AI engine that duplicates prior successful conversation strategies (see e.g., p. 9, first paragraph), and claim 11 calls for an AI engine that is not objectively accurate in responding to queries (see e.g., p. 9, paragraph 2). Claim 12 also calls for forward and backward chaining (see e.g., p. 7, lines 4-6) and claim 14 calls for implementing a subset of second order logic. These features are also believed to not be disclosed by the cited references.

As discussed above, all pending claims 1-20 claim features which are not disclosed in any of the cited references. Therefore, claims 1-20 are believed to be allowable over any combination of the cited references.

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and earnestly solicits a Notice of Allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

Respectfully submitted,



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